RCRA CORRECTIVE ACTION PROGRAM

STATEMENT OF BASIS

December 2020

SWMU 17a – Building 2721

Naval Support Activity Crane

300 Highway 361
Crane, Indiana 47522
Davies, Greene, and Martin Counties
RCRA Permit No. IN5170023498

I. INTRODUCTION

This Statement of Basis addresses Solid Waste Management Unit 17a, Building 2721 (B2721) located at Naval Support Activity (NSA) Crane located in Crane, Indiana.

The Department of Navy, specifically Naval Support Activity, Crane, Crane Indiana is issuing this Statement of Basis to document the determination by the U.S. Environmental Protection Agency (EPA) and Indiana Department of Environmental Management (IDEM) of No Further Action (NFA) required for SWMU 17a at NSA Crane. However, IDEM has requested a land-use control (LUC) for the facility.

This Statement of Basis summarizes information found in greater detail in the PCB Work Plan Revision 2 and the PCB Close Out Report for B2721. This document along with a modification to the RCRA permit will complete the remediation at B2721.

II. FACILITY BACKGROUND

NSA Crane is located in the southern portion of Indiana, approximately 75 miles southwest of Indianapolis and 71 miles northwest of Louisville, Kentucky, immediately east of Crane Village and Burns City (Figure 1). The facility encompasses 62,463 acres (approximately 98 square miles), most of which are located in the northern portion of Martin County. Smaller portions of NSA Crane are located in Greene and Lawrence Counties. NSA Crane is located in a rural, sparsely populated area. Most of NSA Crane is wooded, and the surrounding area is wooded or farmed land. NSA Crane provides material, technical, and logistical support to the Navy for equipment, shipboard weapons systems, and nonexpendable ordnance items. In addition, NSA Crane supports the Crane Army Ammunition Activity with production, renovation, storage, shipment, demilitarization, and disposal of conventional ammunition.

Building 2721 is located on Highway 100 immediately south of the intersection with Highway 5, approximately 3.5 miles east of the NSA Crane Gate (Figure 1). Building 2721 is a two-story, approximately 4,500 square foot, concrete block building built in 1953 on a reinforced, 5-inch-thick, concrete slab. The exterior of the facility is shown in Figure 2. The facility was originally constructed for use as a storage and repair building for power line equipment, including transformers.

III. ENVIRONMENTAL SETTING

NSA Crane covers approximately 100 square miles and is located in a rural sparsely populated area of south-central Indiana (Figure 1). Most of NSA Crane is forested, and the surrounding area is wooded or farmed land.

B2721 is located in the north-central portion of NSA Crane as shown on Figure 1, which is referred to as the industrial area, at an elevation of approximately 740 feet above mean sea level (amsl). Pavement is present on three sides of the facility (north, east, and south). To the west is a hillside, the base of which is the head of Ditch 3, located at an elevation of approximately 718 amsl. Ditch 3 is a part of SWMU 17. The remediation of SWMU 17 is detailed in the Interim Measures Report for SWMU 17, the Final Supplemental SWMU 17 RFI Addendum, and the Surface Water and Sediment Sampling for PCB and PCP Report for SWMU 17.

IV. HISTORY OF OPERATIONS

B2721 was constructed in 1953 as an electrical maintenance and repair shop for powerline equipment. According to Public Works Drawing 689 (Figure 3), the floor drain in a room in the northeast corner of the facility was designated as an “oil receiver”, presumably for the discharge of waste transformer oils. The floor drain was connected via vitreous tile to an open drain discharging to the ravine located to the west of the facility, directly above Ditch 3. Subsequently, an oil water separator tank was installed (year unknown) at the end of the drain line to control the amount of oil being discharged to Ditch 3. In 1955, an above ground storage tank containing transformer oil was installed on the east side of the building. In 1976, oil filtering equipment was installed in B2721 outside the south wall of the boiler room. In the mid-1980s, powerline equipment maintenance operations ceased and initial investigations of PCB contamination began in 1987. PCB remediation efforts were conducted in 1989 and 1990 in preparation for housing the Explosive Ordnance Disposal (EOD) Mobile Unit Two Detachment Crane Operations.

V. EXTENT OF CONTAMINATION

PCB contamination throughout the first floor of the building was likely due to the lack of controls on handling transformers and oils, as well as workers tracking contamination throughout the first and second floors of the building. A remediation effort was undertaken in 1989. This project focused on contamination identified

during the 1987 sampling effort. Limited removals were conducted, which included the floor drain used for dumping waste transformer oils as well as a small amount of surrounding concrete, some contaminated concrete block walls, the wood floor from the upper mezzanine on the west side of the building, and the oil-water separator along with a limited amount of contaminated soil associated with the oil-water separator. Multiple sampling events were conducted in 2016 and 2017 to define the extent of PCB contamination remaining in the facility. Figure 4 shows the extent of contamination that remained in the building prior to the 2020 PCB remediation.

VI. SUMMARY OF ALTERNATIVES

Upon discovery of the extent of PCB contamination remaining in B2721, EOD personnel and equipment were relocated to a former fire station near the northwest corner of the Installation. The initial alternatives considered were to either demolish the facility or to essentially mothball it. However, EOD requested that the building be renovated for their continued occupancy due to the building's centralized location with respect to other Crane operations as well as the physical characteristics of the facility. As such, a near total renovation of B2721 was initiated in 2019, which included remediation of the PCB contamination.

VII. MEDIA CLEANUP STANDARDS

Between January and August 2020, the Navy performed remediation of Building 2721 under the Toxic Substances Control Act (TSCA) self-implementing cleanup and disposal requirements of 40 Code of Federal Regulations (CFR) §761.61 as addressed by the Navy's PCB Removal Work Plan Revision 2. The Media Cleanup Standard was set at the TSCA High Occupancy Standard of ≤1 mg/kg without further controls, or >1 mg/kg or ≤10 mg/kg with a 6-inch concrete cap. Remediation activities included the removal of bulk porous surfaces contaminated with PCBs including the entire 5-inch thick concrete floor, portions of the concrete masonry unit cinder block walls, ductwork, and portions of the concrete foundation stem wall. Confirmation samples were collected of the materials under the concrete after the floor was removed. The results of the majority of samples showed PCB contamination in the subslab material at <1 milligram per kilogram (mg/kg). However, the contaminated concrete floor was wet saw-cut into sections for removal. A sample of the subslab material from a line where the saw cutting occurred in the vicinity of the highest PCB contamination showed PCBs at 3.8 mg/kg. A new 6-inch concrete floor was placed over the existing soil and new CMUs installed.

Since residual PCB contamination is present beneath the floor in B2721 at <10 mg/kg, the contamination has been recorded and these records will be maintained with the NSA Environmental Office as well as documented in the Navy's Internet Navy Facilities Data Store (iNFADS) to prevent incompatible use without further remediation. IDEM has also requested that a land-use control be ascribed to the concrete floor to ensure that its integrity is maintained.

VIII. SCHEDULE FOR REMEDY

PCB cleanup activities occurred during the months from January to August 2020. The Navy submitted the PCB Remediation Closeout Report to the EPA on September 9 2020. After resolution of a comment by the EPA, approval of the report was granted September 30, 2020.

IX. PUBLIC PARTICIPATION

The public is encouraged to review and submit written comments on this proposed determination. If a public hearing is requested, IDEM may hold a public hearing in Bedford, Indiana, to discuss any remedial actions the public proposes. IDEM will publish a newspaper notice 30 days in advance of the requested hearing.

The public notice and Administrative Record documents are available for review at IDEM's Virtual File Cabinet, which is found at http://vfc.idem.IN.gov/. VFC document numbers for documents cited in this Statement of Basis are provided below.

After considering any comments received, IDEM will summarize the comments and its responses to the comments and will announce its decision in a Final Decision/Responses to Comments document. This document will be incorporated into the Administrative Record. To send written comments or obtain further information, contact:

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X. Summary

Following an extensive and successful remediation of PCBs in B2721, the Navy recommends No Further Action for B2721. The presence of residual PCB contamination under the concrete cap has been recorded and will be maintained with the NSA Environmental Office as well as documented in iNFADS. Land Use Controls for the concrete floor will also be implemented.

XI. REFERENCES

Document	Month Year	IDEM VFC #
Surface Water and Sediment Sampling for PCB and PCP Report for SWMU 17	March 2020	83039085
Final Supplemental SWMU 17 RFI Addendum	February 2019	82806333
Interim Measures Report for SWMU 17	March 2018	82537366
B2721 PCB Work Plan Revision 2	October 2019	83080586
B2721 PCB Close Out Report	August 2020	83080588
B2721 Land Use Control Implementation Plan (LUCIP)	December 2020	83090281